



**U.S. Department of Justice**

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January 20, 2022

VIA ELECTRONIC SERVICE

Eric Butts  
Attorney for Defendant **Jeffrey Reuter**

In re: United States v. Jeffrey Reuter  
Cause No. 4:21-CR-425 RWS DDN

Dear Counsel:

As you are aware, your client was indicted by the Federal Grand Jury on July 25, 2021, for events which occurred in December of 2019, in the Eastern District of Missouri. In order to assist you in the determination of any relevant pretrial motions to be filed in this case, please be aware of the following information:

1. **DISCOVERY** - The Government agrees to provide you with all relevant material within the purview of Federal Rule of Criminal Procedure 16. The discovery has been provided to you via USA File Exchange. If you are unable to open or read the content, please contact me immediately.
2. **ELECTRONIC SURVEILLANCE** - The Government did not utilize electronic surveillance in the investigation underlying the charges set forth in the indictment.
3. **CONFIDENTIAL INFORMANTS** - The Government did not utilize a confidential informant in the course of the investigation of this matter.
4. **JENCKS MATERIAL** - The Government agrees to make all Jencks material available no later than the Friday preceding trial, conditioned upon the defendant's agreement to produce simultaneously statements of the defendant's witnesses.
5. **GRAND JURY TRANSCRIPTS** - The Government agrees to produce, and make available for inspection, all Grand Jury transcripts to the extent they constitute Jencks material.
6. **OTHER CRIMES EVIDENCE** - The Government agrees to advise the defendant of its intention to use evidence of other crimes during its case-in-chief. The Government agrees to make this disclosure prior to the trial of this cause.

7. STATEMENTS OF DEFENDANT - The Government is aware of statements made by the Defendant. Documents containing the substance of those statements have been uploaded to the USA File Exchange for your viewing.

8. IDENTIFICATION OF DEFENDANT - The Government is not aware of post-arrest identifications of the Defendant.

9. PHYSICAL EVIDENCE - The Government possesses items of physical evidence seized in relation to the crimes charged in the indictment. These items are available for inspection upon request.

10. FAVORABLE EVIDENCE - The Government agrees to furnish any and all favorable evidence to the Defendant if and when its existence becomes known to the Government. At the present time, the Government does not have any favorable evidence.

For your convenience, the following documents and recordings related to this matter have been uploaded to the USA File Exchange for your viewing or otherwise provided to you:

- St. Louis County Police Department Investigative Report and Supplemental Reports 19-57848 (33 pages)
- 17SL-PN05581 Full Order of Protection (6 pages)
- 17SL-PN05581 Ex Parte Order of Protection and Proof of Service (2 pages)
- “Demand Notice” (21 pages)
- 4:20-MJ-1010 JMB (18 pages)
- Recordings of Reuter jail calls (24 .spx audio files)
- 13SL-DR014001-01 ORDER (13 pages)
- 13SL-DR014001-01 RESPONDENT’S MEMORANDUM IN SUPPORT...(40 pages)
- 13SL-DR014001-01 RESPONDENT’S MOTION FOR JUDGMENT ON THE PLEADINGS...(6 pages)
- 13SL-DR014001-01 RESPONDENT’S MOTION FOR NEW TRIAL (6 pages)
- 13SL-DR014001-01 RESPONDENT’S MOTION TO RECONSIDER (7 pages)
- 4:16-CV-02126 SNLJ COMPLAINT (10 pages)
- 4:16-CV-02126 SNLJ JUDGMENT (1 page)
- 4:16-CV-02126 SNLJ MOTION TO AMEND COMPLAINT (10 pages)
- 4:16-CV-02126 SNLJ MOTION TO AMEND JUDGMENT (2 pages)
- 4:16-CV-02126 SNLJ PLAINTIFF’S MEMORANDUM IN SUPPORT...(3 pages)
- 4:16-CV-02126 SNLJ MOTION TO AMEND JUDGMENT (2 pages)
- 4:16-CV-02126 SNLJ PLAINTIFF’S MEMORANDUM IN SUPPORT...(5 pages)
- Eighth Circuit 17-2108 (3 pages)
- Eighth Circuit 17-2108 Mandate (1 page)
- Eighth Circuit 17-2108 Appellant’s Brief (28 pages)
- Surveillance Video from J.B.’s home (3 .mp4 files, 3 .mov files)
- Nest Video from J.B.’s home (1 .mp4 file)
- Surveillance Video from M.G.’s home (2 .mp4 files, 4 .png files)
- Ring Video from M.G.’s home (1 .mp4 file)
- 19SL-CR-7240 Complaint and Probable Cause Statement (4 pages)

- 19SL-CR07249 Warrant (3 pages)
- Consent to Search (1 page)
- Audio file containing negotiations with Defendant during standoff (1 .mp3 file)
- Interview with the Defendant's parents (1 .m4a file)

I have requested numerous certified records and transcripts/recordings from St. Louis County courts but have not received said items. I will disclose those items to you as soon as I receive them.

Should you have any problems viewing the uploaded files, please contact me immediately. If you need any further specific information regarding the above matters, or any other matters, that will prevent the filing and litigation of any unnecessary pretrial motions, please do not hesitate to call me.

In order to avoid the need for filing motions pursuant to Federal Rules of Criminal Procedure 12.1(a), 16 and 26.2, the Government requests that:

A. The defendant provide the United States a written notice of the defendant's intention to offer a defense of alibi, stating the specific place or places at which the defendant claims to have been at the time of the alleged offense and the names and addresses of the witnesses upon whom the defendant intends to rely to establish such alibi;

B. The defendant provide the United States, or permit the United States to inspect and copy or photograph, books, papers, documents, photographs, tangible objects, or copies thereof, which are within the possession, custody or control of the defendant and which the defendant intends to introduce as evidence in chief at trial;

C. The defendant provide the United States, or permit the United States to inspect and copy or photograph, any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports relate to his testimony;

D. The defendant provide the United States a written summary of testimony the defendant intends to use under Rules 702, 703 and 705 of the Federal Rules of Evidence as evidence at trial. This summary must describe the opinions of the witnesses, the bases and reasons therefor and the witnesses' qualifications;

E. The defendant provide to the United States all statements of any defense witness that are in the defendant's possession and that relate to the subject matter to which the witness will testify.

The Government requests that it receive the information regarding alibi requested in Section A no later than the date of the pretrial motion hearing. The Government also requests that the defendant provide all information specified in Section E no later than noon on the Friday preceding trial to eliminate any delay in the trial of this cause.

I would appreciate a written response prior to any pretrial motion hearing to determine

whether I will have to file formal requests for a court order to enforce discovery compliance.  
I thank you in advance for your anticipated cooperation.

Very truly yours,

SAYLER A. FLEMING  
United States Attorney

/s/ Jennifer Szczucinski  
BY: Jennifer Szczucinski, #56906MO  
Assistant United States Attorney

cc: Clerk, United States District Court (w/o encls.)